

5/7/2009 Langer, Ira

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UNITED STATES DISTRICT COURT

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DISTRICT OF MINNESOTA

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LEMOND CYCLING, INC.,

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Plaintiff,

Case No.

7

-against-

08-CV-01010

8

TREK BICYCLE CORPORATION,

(RHK/JSM)

9

Defendant/Third-Party Plaintiff,

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-against-

11

GREG LEMON, D,

12

Third-Party Defendant.

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14

15

May 7, 2009

16

9:33 a.m.

17

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Deposition of IRA LANGER, held at

19

the offices of Foley & Lardner LLP, 90 Park

20

Avenue, New York, New York, pursuant to

21

Subpoena, before Mildred Cassese, a

22

Registered Professional Reporter and Notary

23

Public of the State of New York.

24

25

EXHIBIT  
F

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2       A P P E A R A N C E S:

3

4               ROBINS, KAPLAN, MILLER & CIRESI LLP

5               Attorneys for Plaintiff LeMond

6                       2800 LaSalle Plaza

7                       800 LaSalle Avenue

8                       Minneapolis, MN 55402-2015

9       BY:     DENISE S. RAHNE, ESQ.

10                       JENNIFER M. ROBBINS, ESQ.,

11                               of Counsel

12

13               GASS WEBER MULLINS LLC

14               Attorneys for Defendant/Third-Party

15               Plaintiff Trek Bicycle Corporation

16               and Witness

17                       309 North Water Street

18                       Milwaukee, WI 53202

19       BY:     RALPH WEBER, ESQ.

20

21       ALSO PRESENT:

22               Bob Burns

23               Trek Vice President & General Counsel

24

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1 I. Langer

2 about how Greg would do these autographs and talk  
3 to people, that Greg was just Greg.

4 Can you sort of elaborate on that a  
5 little bit?

6 A. Sure. Greg would make everyone -- if  
7 someone came over to him and said that they met  
8 him five years ago he would make -- whether he had  
9 actually remembered meeting them five years ago, I  
10 don't know, but they were sure convinced that he  
11 remembered that.

12 Every person who was sitting across  
13 from him was the most important person in the room  
14 at that moment.

15 And there would be 300 people lined up  
16 behind to get his autograph and talk with him, and  
17 he would be spending an inordinate amount of time  
18 with one person because they had some magazine  
19 that he hadn't seen in a long time, or a picture  
20 of a bicycle he hadn't seen in a long time and,  
21 you know, just a nice guy, you know.

22 People liked talking to him and he  
23 like talking to people.

24 Q. Did you ever get any feedback from the  
25 dealers that held these grand openings and events

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1 I. Langer

2 as to what they thought, how well they thought the  
3 event went?

4 A. Yeah. It was always unanimous.

5 People were always, like, oh, when can he come  
6 back again, you know, that kind of thing  
7 because -- and it was two different things: One,  
8 he drew a lot of people; two, he put a great big  
9 smile on everybody's face.

10 Q. So you mentioned that you did some  
11 dealer appearances and you listed several cities  
12 or places, Boston, Colorado.

13 Which ones specifically, which  
14 dealerships do you remember going to with Greg?

15 A. Metro Bicycles in New York.

16 International Bicycles in Boston.

17 Belmont Wheelworks in Boston.

18 Wheat Ridge Cyclery in Colorado.

19 Redlands Cycles in Redlands,

20 California.

21 Chain Reaction in the San Francisco

22 area.

23 Helen's in Santa Monica, California.

24 It's been a while.

25 Q. The time that you went to Metro, is

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2 brand?

3 A. Design, test and promote are three  
4 very different things.

5 Did Greg work closely with Trek to  
6 promote his brand? Absolutely.

7 Did Greg work closely with Trek to  
8 design the brand? To some degree.

9 There wasn't any testing involved that  
10 I would be aware of.

11 Q. How did Greg work with Trek to design  
12 the brand?

13 A. Greg had a philosophy of how a bicycle  
14 should fit, how a bicycle should ride, and it was  
15 a philosophy that made the bicycle a little more  
16 comfortable than some of the other racing bikes  
17 out there, a little more suitable for longer  
18 rides, and most of that had to do with the fact  
19 that in Europe the roads weren't as good as they  
20 are here and the races were longer.

21 Q. So did he just provide suggestions to  
22 people within Trek, or --

23 A. He would provide suggestions. He  
24 would bring his old bicycles and we would, you  
25 know, they would base line them, measure them and